

FILED

UNITED STATES DISTRICT COURT

JAN 23 2019

for the
Southern District of Texas

David J. Bradley, Clerk of Court

United States of America

v.

Case No. B-19-154-MJ

Nicky Lee QUIROZ

Defendant

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

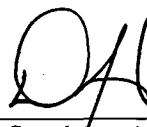
On or about the date of January 22, 2019 in the county of Cameron in the Southern District of
Texas, the defendant violated 18 U.S.C. § 554 and 371,

an offense described as follows:

Knowingly conspired to export or send from the United States, or attempt to export or send from the United States, any merchandise, article, or object contrary to any law or regulation of the United States, or receives, conceals, buys, sells, or in any manner facilitates the transportation, concealment, or sale of such merchandise, article or object, prior to exportation, knowing the same to be intended for the exportation contrary to any law or regulation of the United States, to wit: PSA 10.5" Nitride 5.56 caliber MOE EPT SBA3 Pistol Kit and PSA 16" Carbine-Length 5.56 NATO Nitride MOE EPT Freedom Rifle Kit with Rear MBUS, Flat Dark Earth.

This criminal complaint is based on these facts:

See Attachment A

☐ Continued on the attached sheet.
Complainant's signature

Daniel Hernandez, HSI Special Agent

Printed name and title

Sworn to before me and signed in my presence.

Date: January 23, 2019
Judge's signatureCity and state: Brownsville, Texas

Ignacio Tortez, III, U.S. Magistrate Judge

Printed name and title

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Attachment A

On January 22, 2019, Homeland Security Investigations (HSI) Special Agents (SAs) from the Harlingen, Texas office of the Assistant Special Agent in Charge (ASAC) received information that Nicky Lee QUIROZ was set to receive two 5.56 caliber upper receivers at her residence and then transport them into the Republic of Mexico. SAs observed QUIROZ receive two packages from the United Parcel Service (UPS) at approximately 2:20 p.m. SAs maintained surveillance at the residence. At approximately 4:00 p.m., QUIROZ left her residence in a 2001 Blue Chevy Tahoe and attempted to enter Mexico through the Veterans Port of Entry (POE). During an outbound inspection, Customs and Border Protection Officers (CBPOs) discovered two 5.56 caliber upper receivers concealed inside the rear seat of the Chevy Tahoe. During the interview QUIROZ admitted to conspiring with others to smuggle the 5.56 caliber upper receivers into Mexico and was going to be paid \$600 for this smuggling scheme.




Daniel Hernandez, HSI Special Agent

Sworn to before me and signed in my presence.

DATE: January 23, 2019

Brownsville, Texas



Ignacio Torteya, III
U.S. Magistrate JUDGE